

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of

Amendment of Parts 2 and 97 of the  
Commission's Rules Regarding Allocation of  
a Band near 5 MHz for the Amateur Service

**ET Docket No. 02-98**

**RM - 10209**

By W. Lee McVey, P.E.

To: Chief, Public Safety and Private Wireless  
Branch, Wireless Telecommunications Bureau

**COMMENTS**

My comments are filed in support of the establishment of a new Amateur Band near 5MHz and are meant to provide a reasonable basis for the creation of CW/Digital and Single Side Band (SSB) sub-bands of 25kHz and 125kHz respectively, in view of the mutual incompatibility of the emission types.

I also would like to propose that all license classes with high frequency radiotelephone privileges be granted full operating privileges within this new Band. I wish to thank the Commission for its consideration of my earlier Comments and its request for additional commentary on this matter.

## I. Sub-band Justification

Since 150kHz of spectrum has been selected as the bandwidth for the proposed new Band, it follows that some form of spectrum coordination or management should be employed so as to 1.) Equitably distribute channel loading between voice and non-voice emission types, 2.) Minimize interference from mixed, incompatible emission types and 3.) Help to minimize interference to primary, non-Amateur users of the band.

CW and Digital modes are, by their nature, narrow bandwidth, seldom occupying more than 1 kHz per channel. This premise assumes, of course, that receiving equipment employs effective narrow-band filtering to achieve narrow bandwidth channels. And, that digital mode transmitters employ very narrow-band, frequency shift modulation. As such, 25 1 kHz channels could occupy and effectively use a 25kHz sub-band.

Wider bandwidth, SSB emissions would require about 5kHz for each channel, thus allowing a maximum of 25 such channels in the remaining 125kHz of the proposed band. This again assumes effective transmitter and receiver passband filtering as found in most all modern Amateur equipment.

## II. Equitable Utilization in the Public Interest

Since this Band is intended at least in part to fulfill emergency communication needs when poor propagation conditions exist on the 75/80 and 40 Meter Bands, Technician-Plus and higher licensees should be granted full operating privileges and encouraged to be capable of operation on this Band in the interest of Public Safety.

## III. Conclusion and Recommendations

Equitable and efficient spectrum utilization should be a consideration in this proceeding.

Should the Commission choose to establish sub-bands, emission-specific allocations should facilitate fair and efficient use of available spectrum so as to make this new Band a useful and effective addition to the Amateur Radio Service.

The time for arcane incentive licensing, a concept created to restrict Band access to limit DX contest competition, has long since passed. In the national interest, all should be permitted and encouraged to be capable of operation on this new Band.

Respectfully Submitted,

(electronically)

W. Lee McVey, P.E.  
W6EM  
1301 86<sup>th</sup> Court, NW  
Bradenton, FL. 34209-9309  
July 8, 2002